

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO.: 0:22-CV-61842

DONALD J. TRUMP,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

**MOTION FOR BRIAN M. UNDERWOOD, JR., ESQ. TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Brian M. Underwood, Jr. of the law firm of Bryan Cave Leighton Paisner LLP, 1201 W. Peachtree Street, NW, One Atlantic Center, Atlanta, GA 30309, Telephone: (404) 572-6894 for purposes of appearance as co-counsel on behalf of Defendant, Cable News Network, Inc. ("CNN") in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Brian M. Underwood, Jr., Esq. to receive electronic filings in this case, and in support thereof states as follows:

1. Brian M. Underwood, Jr., Esq. is not admitted to practice in the Southern District of Florida. Mr. Underwood is a member in good standing and currently eligible to practice law in the State of Georgia and is a member in good standing of the United States Court of Appeals for the Eleventh Circuit and the United States District Court for the Northern District of Georgia.

2. Movant, Eric C. Edison, Esquire, of the law firm of Gunster, Yoakley & Stewart, P.A., 450 E. Las Olas Blvd., Suite 1400, Fort Lauderdale, Florida 33301, Telephone: (954) 462-2000, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Brian M. Underwood, Jr., Esq. has made payment of this Court's \$200.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Brian M. Underwood, Jr., Esq., by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Brian M. Underwood, Jr., Esq. at email address: brian.underwood@bclplaw.com.

5. In accordance with S.D. Fla. L.R. 7.1.A.3, the undersigned certify that counsel for the parties have conferred regarding the relief requested herein, and there is no opposition to relief requested.

WHEREFORE, Movant, Eric C. Edison, Esq., moves this Court to enter an Order permitting Brian M. Underwood, Jr., Esq. to appear before this Court on behalf of Defendant, Cable News

Network, Inc. for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Brian M. Underwood, Jr., Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served via the Court's CM/ECF portal on this 21st day of October, 2022 to Lindsey Halligan, Esq., lindseyhalligan@outlook.com, *Counsel for Plaintiff*, 511 SE 5th Avenue, Fort Lauderdale, FL 33301; and James M. Trusty, Esq., jtrusty@ifrahlaw.com; Ifrah Law PLLC, *Counsel for Plaintiff*, 1717 Pennsylvania Ave., N.W., Suite 650, Washington, DC 20006.

GUNSTER, YOAKLEY & STEWART, P.A.

450 East Las Olas Boulevard, Suite 1400

Fort Lauderdale, Florida 33301

Telephone: (954) 462-2000

By: /s/ Eric C. Edison, Esq.

George S. LeMieux, Esq.

Florida Bar No. 16403

Email: glemieux@gunster.com

Eric C. Edison, Esq.

Florida Bar No. 010379

Email: eedison@gunster.com

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DONALD J. TRUMP,

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v.

CABLE NEWS NETWORK, INC.,

Defendant.

CERTIFICATION OF BRIAN M. UNDERWOOD, JR., ESQ.

Brian M. Underwood, Jr., Esquire, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of and currently eligible to practice law in the State of Georgia, and am a member in good standing of the United States Court of Appeals for the Eleventh Circuit and the United States District Court for the Northern District of Georgia; and (3) I have not filed three or more motions for pro hac vice admission in this District within the last 365 days.



Brian M. Underwood, Jr., Esq.